

Office of the Standing Chapter 13 Trustee
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**IN RE:
DARYL D ROGERS & LOVIE TASKER-ROGERS
DEBTORS**

CASE NO: 18-34197-HDH-13

TRUSTEE'S AMENDED OBJECTION TO CONFIRMATION

Now comes the Standing Chapter 13 Trustee herein and files this "Objection to Confirmation" of the Plan, filed herein by Debtors, and would respectfully show the Court as follows:

The plan does not meet the disposable income test pursuant to 11 U.S.C. Section 1325(b).

- The Debtors must pay 100% to all creditors because of UCP
- Under *In re Hardacre*, the Unsecured Creditors Pool (UCP) is calculated to be \$842,556.00, based on Debtors current income and expenses.

The Trustee asserts that the Plan does not meet the requirements of 11 U.S.C. §1325(a)(6), which is known as the "feasibility test."

- Debtors are delinquent on Plan payments.

Trustee requests a Profit and Loss Statement for Debtor 1 from January 2019 to present and corresponding bank statements to determine feasibility.

The proposed plan base is insufficient to pay all secured, priority and administrative claims plus any unsecured creditor's pool and/or non-exempt value.

WHEREFORE, the Standing Chapter 13 Trustee prays that said Plan not be Confirmed unless and until it has been modified to cure all objections set forth herein above, and for general relief.

Respectfully submitted,
THOMAS D. POWERS, CHAPTER 13 TRUSTEE

By: /s/ Tara Tankersley

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DARYL D ROGERS & LOVIE TASKER-ROGERS

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